

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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United States of America,

Plaintiff,

Crim. No. 20-CR-181(1) (PJS/BRT)

v.

Dylan Shakespeare Robinson,

Defendant.

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**DEFENDANT ROBINSON’S UNOPPOSED MOTION TO CONTINUE  
SENTENCING HEARING**

Defendant Dylan Shakespeare Robinson has requested that his undersigned attorney move this Court to continue his sentencing hearing for 30 days, from the current date of April 6, 2021.

Robinson has informed his attorney that he has recently been offered a new full-time job at White Bear Lake Superstore Buick GMC as a car detailer. This is the best job Robinson has ever been offered, and it affords Robinson a unique opportunity to demonstrate his work-ethic and suitability as an employee. Robinson is completely sober for the first time since his early teenage years, following successful treatment for drug and alcohol addiction. He has not tested positive for drugs or alcohol since his arrest. Robinson wants an opportunity to show that he is diligent, hardworking, and drug free.

Working this job with the approval of pretrial services, even for a month, would give Robinson an opportunity to demonstrate his fitness as an employee. The experience would help Robinson become a productive member of society should the Court impose a

sentence of confinement at Robinson's plea hearing. It is highly likely Robinson would be re-hired by this same employer after demonstrating his reliability and value as an employee.

Furthermore, Robinson is concerned about the ongoing safety risk posed by COVID-19. On March 29, Rochelle Walensky, the director of the Center for Disease Control, issued a warning about a potential worrying spike in COVID-19 cases.<sup>1</sup> Given the current progress of vaccinations in Minnesota, an in-person hearing on May 6, 2021 would almost certainly pose less of a risk.

Finally, Robinson and his counsel are concerned about security risks posed by the trial of the State of Minnesota versus Derek Chauvin, taking place at the Hennepin County Courthouse. At present, Chauvin's trial will certainly be ongoing with Robinson's sentencing hearing.

Assistant U.S. Attorneys Harry Jacobs and David Steinkamp do not oppose this motion. Defense counsel appreciates that court staff have already begun work preparing for Robinson's sentencing, and is grateful to the Court and its staff if they will accommodate his request. Robinson requests a 30-day continuance for his sentencing hearing.

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<sup>1</sup> Noah Higgins-Dunn, *CDC Chief Warns U.S. Headed for 'Impending Doom' as COVID Cases Rise Again: 'Right Now I'm Scared'* CNBC (Mar. 29, 2021), <https://www.cnbc.com/2021/03/29/cdc-chief-warns-us-headed-for-impending-doom-as-covid-cases-rise-again-right-now-im-scared-.html>.

Date: March 30, 2021

Respectfully submitted,

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